

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PALTALK HOLDINGS, INC.,

Plaintiff

vs.

CISCO SYSTEMS, INC.,

Defendant.

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No. 6:21-cv-00757

JURY TRIAL DEMANDED

**DECLARATION OF ELISE EDLIN IN SUPPORT OF CISCO'S OPPOSED MOTION
TO STAY PENDING EX PARTE REEXAMINATION**

I, Elise S. Edlin hereby declare as follows:

1. I make this declaration of my own personal knowledge, and if compelled to testify, I could and would competently testify thereto. I am an attorney at Perkins Coie LLP, counsel for Defendant Cisco Systems Inc. ("Cisco"). This declaration is submitted in support of Defendant Cisco's Opposed Motion to Stay Pending *Ex Parte* Reexamination Addressing All Asserted Claims.

2. Attached as **Exhibit 1** is a true and correct copy of Paltalk's September 13, 2022 email requesting that Cisco agrees to an extension of fact discovery ("Paltalk's Request for Extension").

3. Attached as **Exhibit 2** is a true and correct copy of Paltalk's September 7, 2022 deposition notice of Chris Pearce.

4. Attached as **Exhibit 3** is a true and correct copy of Paltalk's August 10, 2022 deposition notice of Cisco Systems, Inc. pursuant to Fed. R. Civ. Pr. 30(b)(6) ("Paltalk's First Deposition Notice").

5. Attached as **Exhibit 4** is a true and correct copy of Paltalk's August 3, 2022 email

requesting depositions of Cisco witnesses Brick Zhang, Wilford Wang, Chris Pearce, Aaron Belcher, Sijia Chen, and Robert Hamilton.

6. Attached as **Exhibit 5** is a true and correct copy of Cisco's February 22, 2022 request for *ex parte* reexamination of U.S. Patent No. 6,683,858.

7. Attached as **Exhibit 6** is a true and correct copy of the United States Patent and Trademark Office's April 18, 2022 order granting Cisco's request for *ex parte* reexamination of U.S. Patent No. 6,683,858.

8. Attached as **Exhibit 7** is a true and correct copy of the United States Patent and Trademark Office's September 7, 2022 office action in *ex parte* reexamination rejecting claims 1–10 of the U.S. Patent No. 6,683,858.

9. Paltalk has taken only one deposition in this litigation, Chris Pearce on September 9, 2022.

10. Cisco has taken only one deposition in this litigation—a Rule 30(b)(6) deposition of Jason Katz on September 14, 2022.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my current knowledge.

Executed this 16th day of September, 2022 in Oakland, California.

/s/ Elise S. Edlin
Elise S. Edlin